

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
VALDOSTA DIVISION**

LAFATH PHILLIPS,

Plaintiff,

v.

CITY OF VALDOSTA,

Defendant.

Civil Action No. 7:21-CV-63 (HL)

PROTECTIVE ORDER

Defendants, Plaintiffs, or other individuals or entities, including non-parties to the above captioned action may produce documents and information in this action which they believe could contain confidential information ("Confidential Material"), disclosure of which could result in such confidential identifying information being released to improper parties and being used for improper purposes. Confidential Material may include information that would be restricted pursuant to 5 U.S.C. § 552a(b)(11) ("Privacy Act"). In an effort to facilitate discovery in this action, the Parties have agreed to this Protective Order as to said Confidential Material.

The Parties' disclosure and/or use of the Confidential Material is strictly limited to legitimate needs for prosecution or defense of this action and shall not be used for any other purpose.

The Parties agree that the Confidential Material may be disclosed to the following:

- (a) The Parties and their agents in this action;
- (b) Counsel for the Parties who are actively engaged in this action;
- (c) Employees of such counsel to the extent reasonably necessary to render professional services in this action;
- (d) The Parties' insurers, outside consultants, and expert witnesses to the extent reasonably necessary for legitimate use in this action;
- (e) Such other individuals as to whom the Parties in writing agree; and
- (f) To Court officials involved in this action, including court reporters (collectively "Permitted Recipients").

The Confidential Material may also be disclosed to any person in the furtherance of this action, upon such terms as the Court may deem proper, including jurors sworn in this action. Confidential Material may be offered into evidence in this action at trial, at any court hearing, or in support or opposition to a motion. The Parties shall maintain the confidentiality of the Confidential Material and abide by the terms of this Protective Order through and after the conclusion of this action. Upon termination of this action, including all appeals therefrom, the Parties shall destroy all copies of the Confidential Material.

Any disputes regarding the confidentiality of a document shall be resolved by the Court. Additionally, the Court reserves full power and jurisdiction to modify, revise or rescind this Order at any time.

SO ORDERED this 18th day of January, 2022.

s/ Hugh Lawson
HUGH LAWSON, SENIOR JUDGE